

No. 24-1680

**In the United States Court of Appeals
for the Eighth Circuit**

MIDWEST DIVISION – RMC, LLC
d/b/a RESEARCH MEDICAL CENTER,
Petitioner

v.

NATIONAL LABOR RELATIONS BOARD,
Respondent

On Petition for Review from the National Labor Relations Board
Case Nos. 14-CA-278811, 14-CA-286571, and 14-CA-287441

**MOTION FOR EXTENSION OF TIME
TO FILE PETITIONER’S APPELLANT BRIEF**

Proloy K. Das
Ford Harrison, LLP
185 Asylum Street
Hartford, CT 06103
(860) 740-1077
pdas@fordharrison.com

Thomas Keim
Ford Harrison, LLP
100 Dunbar Street
Spartanburg, SC 29306
(203) 783-1200
tkeim@fordharrison.com

Patricia G. Griffith
Ford Harrison, LLP
271 17th Street NW
Atlanta, GA 30363
(860) 808-5210
pgriffith@fordharrison.com

Attorneys for Petitioner
Midwest Division – RMC, LLC, d/b/a Research Medical Center

Pursuant to Federal Rule of Appellate Procedure 26(b), the undersigned counsel move for a fourteen (14) day extension to file its principal appellant brief in this matter. Counsel for all parties **consent** to this motion.

Good cause exists for the requested extension because:

First, the record in this case is approximately 900 pages in length;

Second, the undersigned has worked on and is currently working on the following matters: (1) an expedited appeal before the Connecticut Supreme Court in *McCarter an English v. Jarrow Formulas*, S.C. 21013, filed on July 21, 2024, with reply briefs due on August 29, 2024; (2) an expedited appeal before the Connecticut Supreme Court in *7 Germantown Road, LLC v. City of Danbury*, S.C. 21024, in which a brief was filed on August 6, 2024; and (3) preparation for oral argument in San Francisco, CA before the Ninth Circuit in *NLRB v. Los Robles Regional Medical Center*, 23-1950, which will be argued on August 23, 2024.

Third, all parties consent to this motion.

Fourth, the brief has been substantively drafted and is going through the review and revision process. Accordingly, a short fourteen day extension is being requested. The undersigned does not intend to seek any further extensions.

For these reasons, the undersigned respectfully request that the instant motion for extension be granted.

CONCLUSION

For the foregoing reasons, the Petitioner respectfully request an order extending the deadline to file their appellant brief by fourteen (14) days.

Dated: August 13, 2024

Respectfully submitted,
Midwest Division – RMC, LLC, d/b/a
Research Medical Center

/s/ Proloy K. Das
Proloy K. Das
FORDHARRISON LLP
CityPlace II
185 Asylum Street, Suite 820
Hartford, CT 06103
pdas@fordharison.com
(860) 740-1355

CERTIFICATE OF COMPLIANCE

I hereby certify that:

1. This motion complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(2)(A) and because it contains 277 words, exclusive of the exempted portions, as counted by Microsoft Word 2016, the word processing program used to prepare the motion; and

2. The motion complied with the typeface and type-style requirements of Federal Rules of Appellate Procedure 27(d)(1)(E), 32(a)(5), and 32(a)(6), as the text appears in 14-point Times New Roman font, proportionally spaced type face.

3. A copy of the foregoing, Motion on Consent for Extension of Time to File Appellees' Brief was filed electronically. Notice of the filing was sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated:

/s/ Proloy K. Das
Proloy K. Das

- 8/13/2024 1:38 PM